

REMARKS

Please reconsider the application in view of the above amendments and the following remarks. Applicants thank the Examiner for carefully considering this application.

Disposition of Claims

Claims 59-103 were pending in the present application. By way of this reply, claim 99 is cancelled without prejudice or disclaimer. Accordingly, claims 59-98, and 100-103 are now pending in the present application. Claims 59, 73, 87, and 97 are independent. The remaining claims depend, either directly or indirectly, from claims 59, 73, 87, and 97.

Drawings

Applicants respectfully request the Examiner acknowledge the formal drawings filed on July 8, 2008, and indicate whether they are acceptable.

Claim Amendments

By way of this submission, independent claims 59, 73, 87, and 97 are amended for clarification. Applicants respectfully assert that no new matter is introduced by way of these amendments as support for these amendments may be found, for example, in pages 45-48 of the originally filed specification and in the originally filed claims.

Rejections under 35 U.S.C. § 103

MPEP § 2143 states that “[t]he key to supporting any rejection under 35 U.S.C. 103 is the clear articulation of the reason(s) why the claimed invention would have been obvious. The

Supreme Court in KSR noted that the analysis supporting a rejection under 35 U.S.C. 103 should be made explicit.” Further, when combining prior art elements, the Examiner “must articulate the following: (1) a finding that the prior art included each element claimed, although not necessarily in a single prior art reference, with the only difference between the claimed invention and the prior art being the lack of actual combination of the elements in a single prior art reference...” See, MPEP § 2143(A).

Claims 59-65, 68-70, 73-79, 82-84, 87-89, 92-94, and 97-99

Claims 59-65, 68-70, 73-79, 82-84, 87-89, 92-94, and 97-99 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,913, 061 (hereinafter “Gupta”). By way of this reply, claim 99 is canceled without prejudice or disclaimer, so the rejection is moot as to that claim. As to the remaining claims, this rejection is respectfully traversed for the reasons set forth below.

The Examiner contends that Gupta teaches or suggests determining a first HR service and a second HR service of the plurality of HR services affected by the event, wherein the customer holds subscriptions to the first HR service and the second HR service, executing the first update task to update the first HR service based on the event, wherein executing the first update task comprises sending the data item in the first format to the first HR service, and executing the second update task to update the second HR service based on the event, wherein executing the second update task comprises sending the data item in the second format to the second HR service. See, Action, pages 2-3. Applicants respectfully disagree with the Examiner’s contentions.

Gupta discloses a modular application collaborator for providing interoperability between applications including a plurality of connectors for communicating with a like plurality of applications and an interchange server. *See*, Gupta, Abstract. The interchange server includes an application collaboration module and a service module. The service module transfers messages between connectors and the application collaboration module. *See*, Gupta, Abstract. Gupta further discloses the application collaboration module defining the interoperability between two or more applications and includes a trigger and a transaction responsive to the trigger. The trigger is activated upon receipt of data from one or more connectors resulting in the transaction delivering data to one or more connectors for transfer to an associated application. *See*, Gupta, Abstract.

However, Gupta fails to teach or suggest the customer holds subscriptions to the first HR service and the second HR service, as specified by the amended independent claims. Gupta merely teaches receiving a subscription from an object (applications, connectors, collaborations or interchange servers). A subscription service stores the subscription in a subscription list. Upon receipt of an event notification (based on a trigger), a publication service checks the subscription list to determine whether there are any objects which have registered an interest in the received event. If an object has subscribed to the event, then the publication service delivers an object associated with the event notification to each object in the subscription list requesting notification of the particular event. *See* Gupta, column 7, lines 19-31, Figures 2-4.

Gupta teaches *objects* that subscribe to *events*. The amended independent claims recite a customer holds subscriptions to a first HR service and a second HR service. Thus, the amended independent claims disclose *customers* that subscribe to *HR services*. Applicants assert that *objects*

and *customers* are clearly not equivalent, *events* and *HR services* are clearly not equivalent, and that *objects* that subscribe to *events* is clearly not equivalent to *customers* that subscribe to *HR services*. Accordingly, the Examiner has mischaracterized the teachings of Gupta, which is wholly improper.

Gupta also fails to teach or suggest determining a first HR service and a second HR service of the plurality of HR services affected by the event, based on the subscriptions, as specified by the amended independent claims. As described above, Gupta teaches applications subscribing to events, and determining *applications* based on their *subscriptions to events*. Clearly, *subscriptions by applications to events* is not equivalent to *subscriptions by customers to HR services*, and therefore the determination step as recited by the amended independent claims is not taught by Gupta. Applicants assert that the Examiner has mischaracterized the teachings of Gupta, which is wholly improper.

Additionally, Gupta fails to teach or suggest sending the data item in the first format to the first HR service and in the second format to the second HR service, as specified by the amended independent claims. Based on the same logic and reasoning provided above, Gupta cannot possibly teach or suggest sending data items to first and second HR services as disclosed by the amended independent claims. Applicants assert that the Examiner has mischaracterized the teachings of Gupta, which is wholly improper.

In view of the above, Gupta fails to teach or suggest each and every limitation of the amended independent claims. Therefore, the Examiner's contentions do not support the rejections of independent claims 59, 73, 87, and 97. Claims 60-65, 68-70, 74-79, 82-84, 88, 89, 92-94, and 98 depend, either directly or indirectly, from independent claims 59, 73, 87, and 97. Accordingly, the

Examiner's contentions also do not support the rejection of these claims, and withdrawal of this rejection is respectfully requested.

Claims 66, 67, 71, 72, 80, 81, 85, 86, 90, 91, 95, 96, and 100-103

Claims 66, 67, 71, 72, 80, 81, 85, 86, 90, 91, 95, 96, and 100-103 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gupta. For the reasons set forth below, this rejection is respectfully traversed.

As described above and for at least the same reasons, Gupta does not teach each and every limitation of the amended independent claims. Therefore, the Examiner's contentions do not support the rejections of independent claims 59, 73, 87, and 97. Claims 66, 67, 71, 72, 80, 81, 85, 86, 90, 91, 95, 96, and 100-103 depend, either directly or indirectly, from independent claims 59, 73, 87, and 97. Accordingly, the Examiner's contentions also do not support the rejection of these claims, and withdrawal of this rejection is respectfully requested.

Conclusion

Applicants believe this reply is fully responsive to all outstanding issues and places this application in condition for allowance. If this belief is incorrect, or other issues arise, the Examiner is encouraged to contact the undersigned or his associates at the telephone number listed below. Please apply any charges not covered, or any credits, to Deposit Account 50-0591 (Reference Number 37202/107001).

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Respectfully submitted,

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